

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In Re:

Arlene Chism,
Debtor,

Chapter: 13
Case No.: 11-44530
Judge: Tucker

NOTICE OF FIRST POST CONFIRMATION PLAN MODIFICATION

Debtors, through counsel, Christopher E. Frank, pursuant to F.R. Bankr. P. 3015(g), summarizes the proposed modification as follows:

1. Debtor filed Chapter 13 bankruptcy on February 23, 2011.
2. Debtor's Chapter 13 plan was confirmed on July 20, 2011.
3. Pursuant to the Order Confirming Plan, the Debtor is required to remit 100% of their tax refunds.
4. Currently, the plan is 97% paid in and dividend is yielding a 6% dividend based on claims filed.
5. That the Debtor's tax refunds pursuant to the tax returns provided to the Trustee are: 2011 refund \$5,696.00, 2012 refund is \$5,851.00, 2013 refund is \$4,760.00, and the 2014 is \$5,696.00.
6. Debtors has incurred multiple expenses for repairs to the debtor's real property.
7. Debtors have received receipts for costs incurred to date and estimates for the costs and repairs.(See Exhibit D).
8. Debtors are requesting that the tax refunds in the amount of \$22,003.00 be excused for the cost of the above mentioned repairs.
9. Debtor also seeks to extend her plan an additional nine months to meet the current dividend.
10. The Plan Modification as proposed will not effect any of the classes of creditors.
11. The excusal of these payments will not affect the class 8 unsecured dividend as confirmed and creditors will receive an additional \$2,282.00 from the remaining balance of the refunds remitted.
12. In all other respects, the Order Confirming Plan referred to above shall remain in full force and effect.

Wherefore, debtor requests that this court allow:

1. 2011, 2012, 2013, and 2014 Tax refunds in the amount of \$22,003.00 be excused and the Plan term extended an additional 9 months.

Dated: March 6, 2015

/s/ Christopher E. Frank
Christopher E. Frank (P67169)
Attorneys for Debtor
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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In Re:

Arlene Chism,
Debtor,

Chapter: 13
Case No.: 11-44530
Judge: Tucker

NOTICE OF PLAN MODIFICATION

Debtors, through counsel, Christopher E. Frank, pursuant to LBR 3015-2, and F.R.Bankr.P.3015 (g) states:

Debtor has filed a proposed plan modification with the court requesting that:

1. The 2011 tax refunds in the amount of \$9,965.00 be excused.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you don't have an attorney, you may wish to consult one.)

If you do not want the court to modify plan as proposed, or if you want the court to consider your views on the request. Within 20 days, you or your attorney must:

1. File with the court a written response or an answer, explaining your position at:
United States Bankruptcy Court
211 West Fort Street, Suite 2100
Detroit, MI 48226

If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to:

Christopher E. Frank, 6 Parklane Blvd, Ste 665, Dearborn, MI 48126;

Trustee: Tammy Terry

2. If a response or answer is timely filed and served, the clerk will schedule a hearing on the motion and you will be served with a notice of the date, time and location of the hearing.

If you or your attorney do not take these steps, the request shall become effective.

A response or answer must comply with F.R.Civ. P.8 (b), (c), and (e).

Dated: March 6, 2015

/s/ Christopher E. Frank

Christopher E. Frank (P67169)
Attorneys for Debtor
6 Parklane Blvd, Ste 665
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PROOF OF SERVICE

On the **March 6, 2015** a copy of the Notice of Plan Modification, Summary of Proposed Modification, Proposed Worksheet (Exhibit A), Proposed Liquidation Analysis (Exhibit B), Child Support Arrears (Exhibit C), and this Proof of Service were served via ECF filing:

Tammy Terry, Chapter 13 Trustee

VIA First Class U.S. Mail:

All Creditors and Debtor on the Attached Court Matrix;

/s/ Christopher E. Frank
Christopher E. Frank (P67169)
Attorneys for Debtor
6 Parklane Blvd, Ste 665
Dearborn, MI 48126
(313)914-5846
cfrank@theeducgroup.com

Dated: April 2, 2012

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In Re:

Arlene Chism,
Debtor,

Chapter: 13
Case No.: 11-44530
Judge: Tucker

ORDER MODIFYING DEBTOR'S CHAPTER 13 PLAN

A Notice of Proposed Modifications to Debtor(s) Chapter 13 Plan was filed and served on all parties pursuant to LBR 9014; and the Court having found that no objections were received and that the plan modifications comply with 11 USC 1325 and 1329:

NOW THEREFORE;

IT IS ORDERED THAT the Debtor's 2011, 2012, 2013, and 2014 tax refunds in the amount of \$22,003.00 are excused;

IT IS FURTHER ORDER THAT That the chapter 13 Plan of the Debtor shall be extend for an additional nine months.

IT IS FURTHERED ORDERED THAT in all other respects, the Order Confirming Plan, Entered and dated ,, as last amended, shall remain in full force and effect.

IT IS FURTHER ORDERED THAT the effect on each shall be as follows:
CLASS 1:NONE
CLASS 2:NONE
CLASS 3:NONE
CLASS 4:NONE
CLASS 5:NONE
CLASS 6: NONE
CLASS 7: NONE
CLASS 8: NONE